

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

PLANNED PARENTHOOD OF GREATER  
OHIO, and PLANNED PARENTHOOD  
SOUTHWEST OHIO REGION,

Case No. 1:16-cv-539

Judge Michael R. Barrett

Plaintiffs,

v.

RICHARD HODGES,

Defendant.

**PLAINTIFFS' MOTION FOR JUDGMENT ON THE MERITS  
AND A PERMANENT INJUNCTION**

Pursuant to Federal Rules of Civil Procedure 58 and 65, Plaintiffs Planned Parenthood of Greater Ohio ("PPGOH") and Planned Parenthood Southwest Ohio Region ("PPSWO") move this Court to enter judgment in favor of PPGOH and PPSWO, and enter an injunction permanently barring enforcement of Ohio Revised Code § 3701.034, on the grounds asserted in Plaintiffs' Memorandum of Law in Support of Their Motion for Judgment on the Merits and a Permanent Injunction and the record before the Court.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2016, I caused the following documents to be served via ECF and Federal Express on counsel for Defendant Richard Hodges:

- Plaintiffs' Motion for Judgment on the Merits and a Permanent Injunction;
- Plaintiffs' Memorandum of Law in Support of Their Motion for Judgment on the Merits and a Permanent Injunction;
- Declaration of Paul R.Q. Wolfson in Support of Plaintiffs' Motion for Judgment on the Merits and a Permanent Injunction, and Exhibits Thereto;
- Third Declaration of Iris E. Harvey;
- Third Declaration of Jerry H. Lawson;
- Declaration of Stanley K. Henshaw, Ph.D., and Exhibit Thereto;
- Declaration of W. M. Martin Haskell;
- Declaration of Terrie Hubbard; and
- Certificate of Service.

/s/ Paul R.Q. Wolfson  
Paul R.Q. Wolfson  
*Attorney for Plaintiffs Planned Parenthood  
of Greater Ohio and Planned Parenthood  
Southwest Ohio Region*